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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**  
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,  
28 AS TRUSTEE FOR GSR MORTGAGE  
29 LOAN TRUST 2006-4F, MORTGAGE  
30 PASS-THROUGH CERTIFICATES,  
31 SERIES 2006-4F,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,  
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00455-GMN-BNW

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 10] AND MOTION FOR FEES  
AND COSTS [ECF No. 11]**

**(Third Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank  
2 National Association (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of  
3 record, hereby stipulate and agree as follows:

- 4 1. On March 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District  
5 Court, Case No. A-21-831364-C [ECF No. 1-1];
- 6 2. On March 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.  
7 1];
- 8 3. On April 19, 2021, U.S. Bank filed a Motion for Remand [ECF No. 10] and Motion  
9 for Costs and Fees [ECF No. 11];
- 10 4. On May 3, 2021, the Court granted the parties’ first request to extend Chicago Title’s  
11 time to respond to the Motion for Remand and Motion for Costs and Fees;
- 12 5. On June 3, 2021, the Court granted the parties’ second request to extend Chicago  
13 Title’s time to respond to the Motion for Remand and Motion for Costs and Fees;
- 14 6. Chicago Title’s counsel is requesting an additional extension until July 21, 2021, to  
15 file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 16 7. Chicago Title requests a further extension of time to respond to the Motion for  
17 Remand and Motion for Costs and Fees to afford Chicago Title additional time to  
18 respond to the legal arguments set forth in U.S. Bank’s motions;
- 19 8. U.S. Bank does not oppose the requested extension;
- 20 9. This is the third request for an extension which is made in good faith and not for  
21 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended  
3 through and including July 21, 2021.

4  
5 Dated: June 25, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: June 25, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY


14 Dated: June 25, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller  
16 DARREN T. BRENNER  
17 CHRISTINA V. MILLER  
18 Attorneys for Plaintiff U.S. BANK  
19 NATIONAL ASSOCIATION

20  
21 **IT IS SO ORDERED.**

22 Dated this 29 day of June, 2021.

23  
24   
25 Gloria M. Navarro, District Judge  
26 UNITED STATES DISTRICT COURT  
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1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on June 25, 2021, I electronically filed the foregoing with the Clerk

4 of the Court using the CM/ECF system which will send notification of such filing to the

5 Electronic Service List for this Case.

6 I declare under penalty of perjury under the laws of the United State of America that the

7 foregoing is true and correct.

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10 /s/ D'Metria Bolden

11 D'METRIA BOLDEN

12 An Employee of EARLY SULLIVAN

13 WRIGHT GIZER & McRAE LLP

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